

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

XIAOTIAN LIU,

Plaintiff,

v.

KRISTI NOEM, Secretary of the Department
of Homeland Security;

TODD LYONS, Acting Director of the
Immigration and Customs Enforcement;

Defendants.

No. 1:25-cv-00133-SE-TSM

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION
(EXPEDITED ORAL ARGUMENT REQUESTED)

Pursuant to Fed. R. Civ. P. 65(a), and Counts 1 and 2 of Plaintiff’s Complaint for Declaratory and Injunctive Relief—and for the reasons stated in the accompanying memorandum, declarations, and all pleadings filed—Plaintiff respectfully moves this Court to issue a preliminary injunction (i) enjoining Defendants from terminating Plaintiff’s F-1 student status under the Student and Exchange Visitor (SEVIS) system, and (ii) requiring Defendants to set aside their termination determination. The grounds for this motion are set forth in Plaintiff’s accompanying memorandum of law in support of his motion.

Plaintiff also moves this Court for an order waiving the requirement for bond or security.

Xiaotian Liu,

By and through his Counsel,

/s/ SangYeob Kim

Gilles R. Bissonnette (NH Bar: 265393)

Henry Klementowicz (NH Bar: 21177)

SangYeob Kim (NH Bar: 266657)

Chelsea Eddy (NH Bar: 276248)

AMERICAN CIVIL LIBERTIES UNION OF

NEW HAMPSHIRE

18 Low Avenue

Concord, NH 03301

Phone: 603.227.6678

gilles@aclu-nh.org

henry@aclu-nh.org

sangyeob@aclu-nh.org

chelsea@aclu-nh.org

Ronald L. Abramson (NH Bar: 83593)

SHAHEEN & GORDON P.A.

180 Bridge Street

Manchester, NH 03104

603.792.8472

rabramson@shaheengordon.com

Date: April 10, 2025